



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

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Ref: EPR-N

Charles S. Richmond, Forest Supervisor  
GMUG National Forest  
2250 Highway 50  
Delta, CO 81416

Kenny McDaniel, Field Manager  
BLM, Gunnison Field Office  
216 N. Colorado Street  
Gunnison, CO 81230-2197

Re: Gunnison Basin Federal Lands  
Travel Management Draft EIS  
CEQ # 20090055

Dear Messrs. Richmond and McDaniel:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the *Gunnison Basin Federal Lands Travel Management Draft Environmental Impact Statement* (DEIS) concerning federal lands on the Grand Mesa, Uncompahgre, and Gunnison National Forest. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major federal agency action. EPA's comments include a rating of the environmental impact of the proposed action and the adequacy of the NEPA document. The lands analyzed in the DEIS include National Forest System lands administered by the U.S. National Forest Service (FS) and Public Lands managed by the Bureau of Land Management (BLM). Accordingly, the FS and BLM are joint lead agencies for this project.

The 2001 Interim Travel Restriction Decision established a directive for the appropriate agencies to complete a route-specific travel management analysis to evaluate the need for existing routes, as well as determine appropriate modes of travel/vehicle class for designated routes by 2009. This was further supported in 2003 when the Chief of the Forest Service identified unmanaged recreation as a significant threat to National Forest System Lands (see DEIS page 9). In addition to a No Action alternative, the DEIS discloses three action alternatives including a Proposed Action to address these concerns for roads, trails and other areas under the jurisdiction of the USFS and BLM in the analysis area. According to the DEIS, the Proposed Action attempts to strike a balance between resource protection and recreational demand. Alternative 3 focuses on route selection based on natural resource protection objectives, while Alternative 4 stresses recreational opportunities.

Public recreational demand and access have increased significantly in recent years, and motorized uses and roads in many cases have caused increased damage to aquatic and terrestrial



resources. EPA has been particularly concerned about the increasing use of off-highway vehicles (OHVs) that occurs on fragile soils, over water body crossings, and near areas of critical wildlife habitat. There are also concerns regarding water quality, aquatic resources and wildlife habitat impacts associated with the establishment of new trails.

The Proposed Action, Alternative 2, involves approximately 528 miles of motorized trails compared to the 371 miles of motorized trails proposed in Alternative 3. Additionally, Alternative 2 proposes 60-70 miles of new routes, whereas Alternative 3 proposes only 36 miles of new routes (see DEIS pages 35 - 36). Regarding resource protection, Alternative 3 has less adverse environmental impacts overall in such categories as soil and water resources, wetlands and riparian areas, aquatic species, wildlife habitat, sensitive plant species and noxious weeds to name a few (see DEIS page 41). Therefore EPA is in agreement that Alternative 3 is the environmentally preferable alternative and supports this alternative over the Proposed Action, as well as the No Action Alternative and Alternative 4. Alternative 3 seems most consistent with the National Forest Management Act requirement that the FS manage forests in an ecologically sustainable manner that "protects soil and water resources, streams, streambanks, shorelines, wetlands, fish, wildlife and the diversity of plant and animal communities" 36 CFR 219.27(a)(4)(1982).

Page 131 of the DEIS discusses the goals of resource managers "to provide opportunities for people to obtain those recreation motivations and experiences" and "to minimize the impacts of outdoor recreation use on the natural resources." EPA realizes the challenge that the FS and BLM have in providing adequate access for land management and public recreation while protecting and restoring aquatic and terrestrial ecosystems, and acknowledges the agencies' attempt to strike a balance in the Proposed Action. However, where there are conflicts between access and recreational use and long-term protection of resources and ecosystems, EPA believes resource/ecosystem protection must be given priority to sustain and protect natural resources for future generations. EPA very much supports and appreciates efforts to incorporate seasonal restrictions and resource protection closures on roads and trails, in addition to the decommissioning of roads.

#### EPA RECOMMENDATIONS:

##### Watershed Mitigation and Restoration

EPA believes that more information needs to be disclosed regarding planned mitigation for road and trail stream crossings which can cause, among other things, sedimentation loading and possible pollutant delivery. For road construction under the proposed alternative and/or the formal establishment of new routes that may currently exist, EPA's general recommendations include:

1. Minimize road/trail construction and road density to reduce adverse impacts to watersheds;
2. Locate roads/trails away from streams and riparian areas as much as possible;
3. Locate roads/trails away from steep slopes or erosive soils;
4. Minimize road/trail stream crossings;



5. Stabilize cut and fill slopes;
6. Provide adequate road/trail drainage and control surface erosion with adequate waterbars, crowns, rolling dips and ditch relief culverts to promote drainage off roads or along roads/trails;
7. Consider road/trail effects on stream structure and seasonal spawning habitats when determining alignment; and
8. Allow for adequate large woody debris recruitment to streams and riparian buffers near streams.

EPA encourages the FS and BLM to include as much information as possible on watershed restoration actions in the FEIS that will be included in the project to help mitigate for project-related impacts. Wherever possible, EPA recommends the FS and BLM take action to reduce the likelihood of an adverse stream listing or further exacerbate a current condition, especially with existing 303(d) listings in the area. EPA also recommends that additional data/information be provided to support the claim that the "severity" of water quality and aquatic impacts is "subjective" for those impacts expressed by the public that are associated with specific routes listed in the fourth paragraph of page 54 of the DEIS.

#### Air Quality and Climate Change

Although the air quality in the analysis area is currently designated as attainment for all criteria pollutants including particulate matter (DEIS page 191), mitigation measures for dust suppression is considered in the DEIS to control fugitive dust and lessen the impacts to air quality. Unfortunately there are no viable mitigation measures included in the DEIS other than enforcing speed limits (see page 197).

In addition to reducing dust to preserve ambient air quality conditions, EPA invites the BLM and Forest Service to consider ways to reduce dust that may affect early onset of snowmelt within the Gunnison Basin. The National Research Council provided an analysis that may be of interest to you regarding responses to climate change that have resulted in conditions that are projected to lower the stream flow potential on the Colorado River and its headwaters.<sup>1</sup>

#### Cultural Resources

Additionally, it is troubling that many miles of trails on both the FS and BLM lands have not yet been inventoried for cultural resources. Only 529 miles of 1,780 miles of routes have been inventoried for cultural resources on BLM land, and 724 miles of 2,236 miles of routes have been inventoried for cultural resources on FS land (see DEIS pages 178-179). Therefore there may potentially be unidentified sites and unforeseen impacts prior to completion of the cultural resources inventory.

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<sup>1</sup> Colorado River Basin Water Management: Evaluating and Adjusting to Hydroclimatic Variability, Committee on the Scientific Bases of Colorado River Basin Water Management, National Research Council, 2007, <http://www.onthecolorado.com/Resources/ClimateDocs/NAS2007.pdf>.

EPA's role is to evaluate the potential effects of proposed actions and the adequacy of the information in the DEIS. We rate this DEIS an "EC-2" (environmental concerns, insufficient information) as outlined in EPA's enclosed ratings criteria. The EC rating indicates that the reviewer has identified environmental impacts that should be avoided in order to adequately protect the environment. We also recommend additional analysis and information to fully assess and mitigate all potential impacts of the management actions. A complete description of EPA's EIS rating system is enclosed, as well as detailed comments used to determine the project's rating.

We appreciate the opportunity to participate in the review of this project, and look forward to resolving these matters prior to the issuance of the Final EIS (FEIS). If we may provide further explanation of our concerns during this stage of your planning process, please contact me at 303-312-6004, or Melanie Wasco of my staff at 303 312-6540.

Sincerely,

Larry Svoboda  
Director, NEPA Program  
Ecosystems Protection and Remediation

Enclosure